27

28

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION THIS DOCUMENT RELATES TO: All Actions

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

JOINT STIPULATION AND [PROPOSED] ORDER RE REPLACEMENT EXHIBITS TO PLAINTIFFS' CORRECTED OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT (ECF NO. 2413)

Judge: Hon. Yvonne Gonzalez Rogers Magistrate Judge: Hon. Peter H. Kang

15

16

17

18

19

20

21

22

23

24

25

26

27

28

WHEREAS, the Court ordered the parties to meet and confer regarding the filing of excerpted versions of the exhibits, *see* ECF No. 2484 at 2;

WHEREAS, the Court issued an order instructing Plaintiffs "to refile the reduced set of exhibits," and directing the parties to "meet and confer and file a stipulation regarding briefing deadlines for a motion to seal the re-filed exhibits," *see* ECF No. 2549 at 1;

WHEREAS, on December 17, 2025, Plaintiffs re-filed replacement exhibits and an accompanying declaration;

WHEREAS, the parties have met and conferred regarding the page limits and deadlines that will apply to Defendants' motions to seal the replacement exhibits, as well as Plaintiffs' oppositions and Defendants' replies thereto;

THEREFORE, pursuant to Civil L.R. 7-12 and the Court's Case Management Order (ECF No. 2484), the Court hereby directs the Clerk to lock the following docket entries containing the originally filed exhibits and supporting administrative motion to seal, declarations, and sealing charts:

- ECF No. 2356 (Administrative Motion to File Under Seal)
- ECF No. 2357 (Declaration of Previn Warren)
- ECF No. 2403 (Sealing Chart)
- ECF No. 2358 (Exhibits 1-20)
- ECF Nos. 2361 2365 (Exhibits 21-130)
- ECF No. 2367 (Exhibits 131-170)
- ECF Nos. 2370 2372 (Exhibits 171-300)
- ECF Nos. 2374 2381 (Exhibits 301-700)
- ECF No. 2383 (Exhibits 701-750)
- ECF Nos. 2386 2388 (Exhibits 750-825)
- ECF Nos. 2390 2391 (Exhibits 826-900)
- ECF Nos. 2393 2394 (Exhibits 901-1000)
- ECF Nos. 2396 2399 (Exhibits 1001-1185)
- ECF No. 2414-2 (Corrected Declaration of Previn Warren)
- ECF No. 2414-3 (Corrected Sealing Chart)
- ECF Nos. 2414-4 2414-9 (Corrected Exhibits 6, 567, 1117, 1180; Exhibits 1186-1187)

The Court further sets the following, jointly stipulated schedule for conferrals and briefing related to the sealing of the replacement exhibits:

• January 16: Defendants will provide to Plaintiffs redacted versions of the excerpted exhibits, with an index (listing the pages that contain the redactions) that is organized by category.

Defendants' proposed redactions will adhere to any rulings issued by the Court in the interim

	l
1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	

regarding sealing.

- January 19: Plaintiffs will file the redacted versions of the excerpted exhibits. Defendants and Plaintiffs will meet and confer to discuss Defendants' proposed redactions. At this meet and confer, Plaintiffs will tell Defendants their position on each redaction category. Plaintiffs are not required to send Defendants a response to each specific redaction.
- January 26: Defendants file omnibus sealing motions, no longer than 10 pages each, and the parties file an omnibus sealing stipulation.
- February 3: Plaintiffs file oppositions, no longer than 10 pages each, to Defendants' omnibus sealing motions.
- February 8: Defendants file replies, no longer than 5 pages each, in support of omnibus sealing motions.

The above deadlines supersede the deadlines concerning the sealing of these exhibits set forth at ECF No. 2451 at 2.

IT IS SO ORDERED

Dated: December 19, 2025

HONORABLE YVONNE GONZALEZ ROGERS

United States District Court

IT IS SO STIPULATED AND AGREED

Respectfully submitted,

DATED: December 19, 2025 By: /s/ Previn Warren

PREVIN WARREN

MOTLEY RICE LLC

401 9th Street NW Suite 630 Washington DC 20004

Telephone: 202-386-9610 pwarren@motleyrice.com

LEXI J. HAZAM LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

l l	
1	275 BATTERY STREET, 29TH FLOOR
2	SAN FRANCISCO, CA 94111-3339
	Telephone: 415-956-1000 lhazam@lchb.com
3	
4	Co-Lead Counsel
5	
6	CHRISTOPHER A. SEEGER SEEGER WEISS, LLP
7	55 CHALLENGER ROAD, 6TH FLOOR
8	RIDGEFIELD PARK, NJ 07660 Telephone: 973-639-9100
	cseeger@seegerweiss.com
9	Counsel to Co-Lead Counsel and Settlement Counsel
10	Counsel to Co-Lead Counsel and Settlement Counsel
11	JENNIE LEE ANDERSON
12	ANDRUS ANDERSON, LLP 155 MONTGOMERY STREET, SUITE 900
13	SAN FRANCISCO, CA 94104
	Telephone: 415-986-1400 jennie@andrusanderson.com
14	
15	Liaison Counsel and Ombudsperson
16	MATTHEW BERGMAN
17	SOCIAL MEDIA VICTIMS LAW CENTER 821 SECOND AVENUE, SUITE 2100
18	SEATTLE, WA 98104
19	Telephone: 206-741-4862 matt@socialmediavictims.org
20	JAMES J. BILSBORROW WEITZ & LUXENBERG, PC
21	700 BROADWAY
22	NEW YORK, NY 10003 Telephone: 212-558-5500
23	jbilsborrow@weitzlux.com
24	ELLYN HURD
	SIMMONS HANLY CONROY, LLC
25	112 MADISON AVE, 7TH FLOOR
26	NEW YORK, NY 10016 Telephone: 212-257-8482
27	ehurd@simmonsfirm.com
28	ANDRE MURA

1	
1	GIBBS MURA, LLP
2	1111 BROADWAY, SUITE 2100
2	OAKLAND, CA 94607
3	Telephone: 510-350-9717
4	amm@classlawgroup.com
4	MICHAEL M. WEINKOWITZ
5	LEVIN SEDRAN & BERMAN, LLP
	510 WALNUT STREET
6	SUITE 500
7	PHILADELPHIA, PA 19106
	Telephone: 215-592-1500
8	mweinkowitz@lfsbalw.com
9	MELISSA YEATES
	KESSLER TOPAZ MELTZER & CHECK LLP
10	280 KING OF PRUSSIA ROAD
11	RADNOR, PA 19087
	Telephone: 610-667-7706
12	myeates@ktmc.com
13	Plaintiffs' Steering Committee Leadership
14	RON AUSTIN
15	RON AUSTIN LAW
	400 MANHATTAN BLVD.
16	HARVEY, LA 70058
7	Telephone: 504-227-8100
17	raustin@ronaustinlaw.com
18	AELISH M. BAIG
19	ROBBINS GELLER RUDMAN & DOWD LLP
	1 MONTGOMERY STREET, #1800
20	SAN FRANCISCO, CA 94104
21	Telephone: 415-288-4545
21	AelishB@rgrd.com
22	PAIGE BOLDT
23	ANAPOL WEISS
	130 N. 18TH STREET, #1600
24	PHILADELPHIA, PA 19103
25	Telephone: 215-929-8822
دع	pboldt@anapolweiss.com
26	THOMAS D. CADTMELL
27	THOMAS P. CARTMELL WAGSTAFF & CARTMELL LLP
<i>'</i> /	4740 Grand Avenue, Suite 300
28	Kansas City, MO 64112

- 1	
1	Telephone: 816-701-1100
2	tcartmell@wcllp.com
3	FELICIA CRAICK KELLER ROHRBACK LLI
4 5	1201 THIRD AVENUE, SUIT SEATTLE< WA 98101
6	Telephone: 206-623-1900 fcraick@kellerrohrback.com
7	SARAH EMERY
8	HENDY JOHNSON VAUGI 600 WEST MAIN STREET, S
9	LOUISVILLE, KT 40202 Telephone: 859-600-6725
10	semery@justicestartshere.com
11	KIRK GOZA GOZA HONNOLD
12	9500 NALL AVE. #400
13	OVERLAND PARK, KS 6620 Telephone: 913-412-2964
14	Kgoza @gohonlaw.com
15	RONALD E. JOHNSON, JR.
16	HENDY JOHNSON VAUGI 600 WEST MAIN STREET, S
17	LOUISVILLE, KT 40202 Telephone: 859-578-4444
18	rjohnson@justicestartshere.com
19	MATTHEW P. LEGG
20	BROCKSTEDT MANDALA 2850 QUARRY LAKE DRIV
21	BALTIMORE, MD 21209 Telephone: 410-421-7777
22	mlegg@lawbmf.com
23	SIN-TING MARY LIU
24	AYLSTOCK WITKIN KRE OVERHOLTZ, PLLC
25	17 EAST MAIN STREET, SU PENSACOLA, FL 32502
26	Telephone: 510-698-9566 mliu@awkolaw.com
27	
28	

ACK LLP UE, SUITE 3400

N VAUGHN EMERY PSC

TREET, SUITE 100 -02026725

400 , KS 66207

SON, JR. N VAUGHN EMERY PSC TREET, SUITE 100

0202 4444 tshere.com

ANDALAS FEDERICO, LLC KE DRIVE, SUITE 220

KIN KREIS & LC

REET, SUITE 200

l l	ı
1	
2	
1 2 3 4 5 6 7 8	
4	
5	
6	
7	
8	
10	
11	
12	
13	
13 14	
1.5	
16	
17	
17 18	
19	
20	
21	
22	
2324	
25	
2627	
28	

JAMES MARSH
MARSH LAW FIRM PLLC
31 HUDSON YARDS, 11TH FLOOR
NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

JOSEPH H. MELTER **KESSLER TOPAZ MELTZER & CHECK LLP** 280 KING OF PRUSSIA ROAD RADNOR, PA 19087

Telephone: 610-667-7706 jmeltzer@ktmc.com

HILLARY NAPPI HACH & ROSE LLP

112 Madison Avenue, 10th Floor New York, New York 10016 Telephone: 212-213-8311 hnappi@hrsclaw.com

EMMIE PAULOS LEVIN PAPANTONIO RAFFERTY 316 SOUTH BAYLEN STREET, SUITE 600 PENSACOLA, FL 32502 Telephone: 850-435-7107 epaulos@levinlaw.com

RUTH THI RIZKALLA
THE CARLSON LAW FIRM, PC
1500 ROSECRANS AVE., STE. 500
MANHATTAN BEACH, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: 818-839-2333
rtellis@baronbudd.com
dfernandes@baronbudd.com

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	

DIANDRA "FU" DEBROSSE ZIMMERMANN **DICELLO LEVITT** 505 20th St North Suite 1500 Birmingham, Alabama 35203 Telephone: 205-855-5700 fu@dicellolevitt.com

Plaintiffs' Steering Committee Membership

JOSEPH VANZANDT **BEASLEY ALLEN**234 COMMERCE STREET

MONTGOMERY, LA 36103

Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

Federal/State Liaison

Attorneys for Individual Plaintiffs

	1
	2
	3
	4
	5
	6
	7
	8
	9
1	0
1	1
1	2
1	3
1	
1	5
1	6
1	7
	8
1	9
	0
2	
	2
	3
	<i>3</i>
	4 5
2	6
,	- /

COVINGTON & BURLING LLP

Ashley M. Simonsen (Bar No. 275203) COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, California 90067 Telephone: (424) 332-4800 Facsimile: (424) 332-4749 Email: asimonsen@cov.com

Phyllis A. Jones (pro hac vice)
Paul W. Schmidt (pro hac vice)
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: (202) 662-6000
Facsimile: (202) 662-6291
Email: pajones@cov.com
Email: pschmidt@cov.com

Attorneys for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Meta Payments Inc. f/k/a Facebook Payments Inc.; Meta Platforms Technologies, LLC f/k/a Facebook Technologies, LLC; Instagram, LLC; and Siculus LLC f/k/a Siculus, Inc.

KING & SPALDING LLP

By: /s/ Bailey J. Langner
Geoffrey M. Drake, pro hac vice
TaCara D. Harris, pro hac vice
1180 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309-3521
Telephone: (404) 572-4600
Facsimile: (404) 572-5100
Email: gdrake@kslaw.com
tharris@kslaw.com

David P. Mattern, pro hac vice KING & SPALDING LLP 1700 Pennsylvania Avenue, NW, Suite 900 Washington, DC 20006-4707 Telephone: (202) 737-0500 Facsimile: (202) 626-3737

-	
1	Email: dmattern@kslaw.com
2	Bailey J. Langner (SBN 307753)
3	KING & SPALDING LLP
4	50 California Street, Suite 3300 San Francisco, CA 94111
5	Telephone: (415) 318-1200
	Facsimile: (415) 318-1300 Email: blangner@kslaw.com
6	Attornana for Defendanta TileTole Inc. Porto Dance Inc.
7	Attorneys for Defendants TikTok Inc., ByteDance Inc., TikTok Ltd., ByteDance Ltd., and TikTok LLC
8	
9	MUNGER, TOLLES & OLSON LLP
10	By: /s/ Victoria A. Degtyareva
11	Jonathan H. Blavin, SBN 230269
12	MUNGER, TOLLES & OLSON LLP 560 Mission Street, 27th Floor
13	San Francisco, CA 94105
	Telephone: (415) 512-4000 Facsimile: (415) 512-4077
14	Email: jonathan.blavin@mto.com
15	Victoria A. Degtyareva (SBN 284199)
16	MUNGER, TOLLES & OLSON LLP 350 South Grand Avenue, 50th Floor
17	Los Angeles, CA 90071
18	Telephone: (213) 683-9100
19	Facsimile: (213) 687-3702 Email: victoria.degtyareva@mto.com
20	ALLISON BROWN (pro hac vice)
	KIRKLAND & ELLIS LLP
21	2005 Market Street, Suite 1000 Philadelphia PA 10103
22	Philadelphia, PA 19103 Telephone: (215) 268-5000
23	Email: alli.brown@kirkland.com
24	JESSICA DAVIDSON (pro hac vice)
25	Email: jessica.davidson@kirkland.com
26	JOHN J. NOLAN (pro hac vice) Email: jack.nolan@kirkland.com
	KIRKLAND & ELLIS LLP
27	601 Lexington Avenue New York, NY 10022
28	Telephone: (212) 446-4800

Attorneys for Defendant Snap Inc.

WILLIAMS & CONNOLLY LLP

By: /s/ Ashley W. Hardin
Joseph G. Petrosinelli (nr.

Joseph G. Petrosinelli (pro hac vice) jpetrosinelli@wc.com
Ashley W. Hardin (pro hac vice) ahardin@wc.com
680 Maine Avenue, SW
Washington, DC 20024

Telephone.: 202-434-5000

Fax: 202-434-5029

Attorneys for Defendants YouTube, LLC and Google LLC